

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	TODD E. HARRIS	:	CHAPTER 13
		:	
		:	CASE NO. 14-13859
	Debtors	:	
		:	Date: December 17, 2014
		:	Time: 10:00 a.m.
		:	Location: Courtroom #4

**DEBTOR'S OBJECTION TO PROOF OF
CLAIM #2 FILED BY CHASE BANK USA**

Debtor, Todd E. Harris, by and through his attorneys, Lohr & Associates, Ltd., comes forward and files the following objection to claim number 2 in the amount of \$104,439.58 filed by creditor Chase Bank, USA.

1. On May 13, 2014, the Debtor filed a voluntary petition under chapter 13 of the Bankruptcy Code thereby initiating the above-captioned bankruptcy case.
2. Prior to commencing his voluntary bankruptcy case, the Debtor negotiated an arrangement with Allied International Credit ("AIC"), as an agent of JP Morgan Chase, whereby the Debtor was required to provide a down payment in the amount of \$15,000 followed by eleven (11) monthly payments each in the amount of \$1,172.73 (the "Agreement"). A true and correct copy of the Agreement with JP Morgan Chase is attached hereto as Exhibit 1.
3. The Debtor timely made the down payment and payments of \$1,172.73 for the months of March and April.
4. The Debtor also mailed his May, 2014, payment in the amount of \$1,172.73, however, this payment was returned.
5. JP Morgan Chase, by and through its agent AIC has also refused to accept any post-petition payments subject to the Agreement.

6. On June 11, 2014, Chase Bank USA, N.A., F/K/A/ Chase Manhattan Bank, USA, National Association (“Chase”), filed a secured proof of claim, claiming the Debtor’s residence located at 1112 Laurel Road, Catsville (*sic*), PA 19320, as collateral for the claim.
7. Contrary to the terms and conditions of the Agreement, Chase filed the proof of claim in the amount of \$104,439.58.

WHEREFORE, the Debtor request that this Honorable Court disallow Chase’s claim number 2 and replace with a secured claim in the amount of \$10,554.57.

Respectfully submitted,

Lohr & Associates, Ltd.

Date: November 17, 2014

By: /s/ Robert J. Lohr II
Robert J. Lohr II
Lohr & Associates, Ltd.
1246 West Chester Pike
Suite 312
West Chester, PA 19382
(610) 701-0222 - telephone
(610) 431-2792 - facsimile
bob@lohrandassociates.com - e-mail